

8-7-03
12.38.8



NORTHWEST REGIONAL OFFICE

Facsimile Cover Sheet

DATE: 8/7/2003

TIME: 3:30

Number of Pages: 3 Plus Cover Sheet

TO: Servy Brown
Ash Grove Cement

FAX # 206-623-5355

FROM: Alii North

PHONE: 425-649-7142 SECTION: Haz Waste & Toxic Ref

Department of Ecology
Northwest Regional Office
3190 - 160th Avenue S.E.
Bellevue, WA 98008-5452
Phone: (425) 649-7000
Fax: (425) 649-7098

COMMENTS: Here is the paperwork I mentioned
See you tomorrow

USEPA SF



1274798

AGC2E000677

Procedure 2-4-2: Conducting An Annual Review of Inactive Facilities

Test for Inactive Facility Status

Complete this checklist to determine if your facility may qualify as an inactive facility.

	YES	NO	NOT SURE
Does the facility generate less than 2,640 lbs. of dangerous waste?	___	___	___
Have you determined that there are no feasible opportunities to reduce hazardous substance use and/or hazardous waste generation?	___	___	___
Would your facility have to reduce production to reduce the amount of hazardous substances used?	___	___	___
Are the hazardous substances or products you use prevented from significant releases to the environment?	___	___	___
Are all discharges to the environment permitted?	___	___	___
Will your efforts in P2 planning result in no benefit to your facility or the general public?	___	___	___

If you answer "yes" to all of the above questions you should continue the process by preparing documentation to support your "yes" answers. The documentation should follow the attached guidelines. Any "no" answer probably means you do not qualify and need not do anything further. If you are "not sure", you may wish to consult with Ecology staff.

If you do proceed, submit the checklist and documentation to one of the regional offices listed below. Ecology will review the information and notify you in writing of the determination.

Northwest Regional Office
Department of Ecology
3190 160th Ave. SE
Bellevue, WA 98008-5452
Dennis Johnson
(206) 649-7040

Eastern Regional Office
Department of Ecology
N 4601 Monroe, Suite 100
Spokane, WA 99205-5301
Doug Jayne
(509) 456-6171

Southwest Regional Office
Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
Hugh O'Neill
(360) 407-6354

Central Regional Office
Department of Ecology
15 W. Yakima Ave. Suite 200
Yakima, WA 98902
Mark Benedict
(509) 575-2803

Procedure 2-4-2: Conducting An Annual Review of Inactive Facilities

Documentation Guidelines for Inactive Facilities

Certain facilities may be excluded from the requirement to submit pollution prevention plans and/or annual progress reports. The following guidelines will help you document your facility's potential inactive status. The amount of information submitted will depend upon the size and complexity of your facility. If you have questions on these guidelines, contact the appropriate Ecology regional office.

- I. Identify the facility being considered by site location and identification number. Briefly describe why you think the facility should be excluded from submitting a pollution prevention plan and/or annual progress reports.
- II. Describe how the facility has maximized its efficient use of hazardous substances or hazardous raw materials, thereby having no opportunities for reduction.
- III. Describe what effect using less hazardous substances would have on the facility's production level and economic viability.
- IV. Describe the company's efforts to thoroughly investigate pollution prevention opportunities for the hazardous substances used.
- V. Describe your company's efforts to thoroughly investigate pollution prevention opportunities for any hazardous wastes you might generate.
- VI. Explain why P2 planning/reporting would not be beneficial to the facility or the general public.

Submit this information and the Test for Inactive Facilities Status to the Ecology regional office in your area. The department will review the information and make a determination of eligibility. You may be called for clarification or more information, and a site visit will be necessary. You will be notified in writing of a decision.